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Filing date: **06/29/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92061525
Party	Defendant QUALA S.A.
Correspondence Address	FELIPE RUBIO GLOBAL IP SERVICES 10691 N KENDALL DR STE 201 MIAMI, FL 33176-1595 UNITED STATES feliperubio@bellsouth.net
Submission	Answer
Filer's Name	Humberto Rubio
Filer's e-mail	mail@rubiolaw.com, hrubio@rubiological.com, frubio@rubiological.com
Signature	/humberto rubio/
Date	06/29/2015
Attachments	Hogarena Answer.pdf(198782 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

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BAGLEY ARGENTINA S.A.,	:	
	:	
Opposer,	:	Cancellation No. 92061525
	:	
v.	:	Registration No. 3,614,445
	:	
	:	
QUALA S.A.,	:	
	:	
	:	
Registrant.	:	
	x	

**REGISTRANT’S ANSWER TO PETITION FOR CANCELLATION**

Registrant, QUALA, S.A., (“Registrant”), for its answer to the Petition for Cancellation filed by Bagley Argentina S.A. (Petitioner), against U.S. Trademark Registration No. 3,614,445 for HOGAREÑA with registration date of May 5, 2009, pleads and avers as follows:

1. As to Paragraph 1 of the Notice of Opposition, Registrant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and thus denies the same, leaving Opposer to its strict proof at trial.
2. As to Paragraph 2 of the Notice of Opposition, Registrant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and thus denies the same, leaving Opposer to its strict proof at trial.
3. As to Paragraph 3 of the Notice of Opposition, Registrant admits to the allegation contained therein.

4. As to Paragraph 4 of the Notice of Opposition, Registrant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and thus denies the same, leaving Opposer to its strict proof at trial.

5. As to Paragraph 5 of the Notice of Opposition, Registrant denies each and every allegation contained therein.

6. As to Paragraph 6 of the Notice of Opposition, Registrant denies each and every allegation contained therein.

7. As to Paragraph 7 of the Notice of Opposition, Registrant denies each and every allegation contained therein.

8. As to Paragraph 8 of the Notice of Opposition, Registrant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and thus denies the same, leaving Opposer to its strict proof at trial.

Dated: June 29, 2015

Respectfully submitted,

/humberto rubio/  
Humberto Rubio  
Law Firm of Rubio & Associates  
8950 SW 74<sup>th</sup> Ct, Suite 1804  
Miami, FL 33156  
hrubio@rubiolegal.com

Attorney for Registrant  
Quala S.A.

**PROOF OF SERVICE**

On June 29, 2015 I caused to be served the following document:

ANSWER

On Petitioner by placing a true copy thereof in the United State mail enclosed in an envelope, postage prepaid, addressed as follows to their counsel of record at his present business address:

PERLA M. KUHN  
FOX ROTHSCHILD LLP  
997 LENOX DRIVE, BUILDING 3  
LAWRENCEVILLE, NJ 08648-2311

Executed on June 29, 2015

/humberto rubio/  
Humberto Rubio  
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Attorney for Registrant  
Quala S.A.